COMMENTS SUMMARY BISCAYNE NATIONAL PARK GENERAL MANAGEMENT PLAN

The National Park Service (NPS) is in the process of developing a General Management Plan (GMP) for Biscayne National Park. The GMP will guide the management actions of the park for the next fifteen to twenty years.

Regulations of the Council on Environmental Quality for implementing the National Environmental Policy Act (NEPA) require that a discussion of the "Purpose of and Need for Action" be included in all environmental impact statements. NPS guidance for implementing NEPA defines need as "conditions that must be changed, problems that must be remedied, decisions that must be made, and/or policies and mandates that must be implemented." To help determine what decisions must be made or problems that must be remedied, the full range of people's interests and concerns need to be identified.

This summary analyzes comments received during the public comment period between November 2000 and November 2001, when the NPS conducted public scoping to identify the range of interest and concern in developing a General Management Plan (GMP) for Biscayne National Park. Initial public scoping was conducted in public and staff meetings in November of 2000, and January of 2001. Newsletter #1 was distributed in December 2000. Newsletter #2, distributed in September 2001, contained a summary of scoping comments as well as draft management prescriptions. Public meetings were held in South Florida at the end of September 2001.

Included in this summary are comments received in response to the two newsletters, public meetings, and staff workshops over the past year from November 2000 to November 2001. A total of 2,675 comments were tabulated from the initial round of public scoping, November 2000 through April 2001. Included in this total are 784 electronic bulk-mail responses from National Parks and Conservation Association members and 613 electronic and bulk-mail responses regarding Stiltsville. Comments were also received from the following organizations, advocacy groups, and public land management agencies:

- National Parks and Conservation Association
- The Marine Council
- Center for Marine Conservation
- Sierra Club

- Bluewater Network
- Biodiversity Legal Foundation
- Florida Biodiversity Project
- Tropical Audubon Society, Inc. a.k.a. The Featherbeds Initiative, Inc.
- A request for additional information was received from the Miami-Dade County Park and Recreation Department.

A total of 769 comments were received during the second round of public scoping. Included in this total are 381 electronic bulk-mail responses from National Parks and Conservation Association members. Comments were also received from the following organizations, businesses, advocacy groups, and public land management agencies:

- Miami-Dade County Park and Recreation Department
- Tropical Audubon Society, Inc. a.k.a. The Featherbeds Initiative, Inc.
- The Marine Council
- Miami Springs Power Boat Club
- Key Biscayne Snorkel Adventure

THE PROCESS OF SORTING OF COMMENTS:

Comments received spanned a wide range of issues from public access to fishing, to partnership opportunities. Not all of the interests and concerns received are GMP level issues. Some of the concerns or issues raised are actions that cannot be taken because they are inconsistent with law or policy. For example, a suggestion that "the park charge senior citizens who can afford it a higher entrance fee" is not consistent with law or policy. On the other hand, some concerns are so specific they would be better addressed at the next level of planning. An example of a specific concern best addressed at the next level of decision-making is for the park to "remove two young trees closest to the boat-launch site." Still other issues are outside of the scope for a general management plan. An example of a concern that is outside of the scope for the GMP is for the park "to restore the Miami River to its historical ecological condition."

Because the public scoping effort generated comments that are not GMP level issues, the comprehensive list of concerns was sorted through the following filter:

Comprehensive List of		• Things that might be
Interests and Concerns	Д	done GMP level
	FILTER: LAW ANI POLICY	issue
		• Things that must be
		done
		 Things that cannot
		be done
		• Things that might be
		done (other plans)
		• Not a planning issue

All written comments received (including electronic comments) were sorted through this filter and alpha codes were assigned as follows:

- G comments are General Management Plan (GMP) issues
- M comments represent issues or concerns that must be addressed because they are mandated by law or policy
- O comments are issues that are more appropriately addressed by an implementation plan
- Z comments are issues that are outside the scope or are issues that can't be taken because they are inconsistent with law or policy.

After sorting comments through the filter of what must be done, what cannot be done, and what is outside of the scope of the GMP, the resulting GMP-level comments were further separated into the following categories and sub-categories:

• RESOURCE PROTECTION (R)

- ⇒ Water Quality (W)
- \Rightarrow Air Quality (A)
- \Rightarrow Soundscapes (S)
- ⇒ Coral Reef (Coral Reef Initiative) (R)
- ⇒ Flora and Fauna (Including Threatened and Endangered Species and Exotic Species) (F)
- ⇒ Adjacent Lands and Resource Issues (N)
- \Rightarrow Viewshed (V)
- ⇒ Sustainable Ecosystem (E)
- ⇒ Cultural Resources (Terrestrial and Submerged) (C)

• VISITOR EXPERIENCE (V)

- ⇒ Public Access to Representative Resources (A)
- ⇒ Recreational Uses (Including Snorkeling, Diving, Hiking, Picnicking) (R)
- ⇒ Recreational Fishing (Including Commercial Guide Fishing) (F)
- ⇒ Recreational Boating (Including motorized and non-motorized) (B)
- ⇒ Recreational Facilities (Including Visitor Centers, Concessions Operations, Campgrounds) (F)
- \Rightarrow Navigation Channels (N)
- \Rightarrow Educational Programs (E)

• LAND USE/ECONOMIC DEVELOPMENT (L)

- ⇒ Law Enforcement (Resource Protection, Public Safety) (E)
- \Rightarrow Operations (Administration) (**O**)
- \Rightarrow Partnerships (**P**)
- ⇒ Boundary Adjustments (B)
- \Rightarrow Stiltsville (S)
- \Rightarrow Commercial Fishing (**F**)

The range of GMP-level planning issues sorted by the categories above, cover a wide range of possible resource conditions and visitor experiences. Examining this range helps formulate possible visions for the future of Biscayne National Park. A vision for the future of the park deals with the balance between primary park missions – protecting resources and providing visitor enjoyment. The range of planning issues are described by category below:

Resource Protection: For many respondents, sustainable ecosystems and cultural resource protection are important to the purpose and significance of the park. Coral reef protection, water and air quality, soundscapes, threatened and endangered species, and the importance of cultural resources all received comment.

In general, there is strong support for the preservation and protection of park resources. There is also a concern that the park has a responsibility to restore natural resources.

• Coral reef biodiversity is an important issue. Comments indicate that coral reefs need protection, and that there is a need to "set aside coral reef areas or to establish no-take zones to implement the Coral Reef Initiative."

(23 individual newsletter responses, and 1,165 comments from National Parks and Conservation Association members stated that coral reef biodiversity is important and that the coral reef resources of the park are in need of preservation and protection).

On the other hand, there is also the perception that marine resources are not being depleted and that the ecosystem is sustaining itself. For example, one comment stated that the respondent had seen "no degradation to coral" comment #0060. There is also a concern among recreational and commercial fishermen about "closures" of any park of the park, including coral reefs (8 comments were opposed to closures).

NPCA, Center for Marine Conservation, Biodiversity Legal Foundation, Florida Biodiversity Project, and the Tropical Audubon Society ask the park to devise effective strategies for conserving and recovering its coral reef resources).

• There is strong support for protecting the air and water quality of the park. In general, respondents feel that clean water is important and that the park should maintain excellent water quality. There are concerns that balancing the impact of greater use of the park with maintaining good water quality is difficult. Sixty-eight individual newsletter responses are concerned with water quality issues from fresh-water releases into Biscayne Bay to vessel discharges and contamination of water from adjacent land uses. Respondents are also concerned about how the Biscayne Bay Coastal Wetlands Project of the Comprehensive Everglades Restoration Plan will impact park resources.

Seven hundred eighty-four responses from NPCA members stated that in 15-20 years the park "...should remain at LEAST as natural, pristine and unpolluted as it is today..." and that "...as we learn more about our natural world, we can help restore this park to a more natural state, closer to what it was at the turn of the century, before water from the Everglades was diverted for agricultural and other human use."

Comments from. NPCA, Center for Marine Conservation, Biodiversity Legal Foundation, Florida Biodiversity Project, and the Tropical Audubon Society state that the GMP should ensure that CERP replaces historic clean water flows to the park; that seepage from commercial landfills is contained; that Military Canal is cleaned-up; and that while

- "...water based activities such as power boating can provide excellent opportunities for the visiting public to enjoy park resources, some forms of boating and the marine two-stroke engines, which drive many of the craft plying America's waters today, can often cause damage to air and water quality as well as plants and wildlife."
- Natural soundscapes are an important issue for several respondents and the need to protect natural soundscapes is voiced. Thirty-four individual newsletter comments stated that the "...waterways were too noisy and that natural soundscapes should be preserved." Twenty-four comments said that "noisy visitors infringed on natural quiet and that natural quiet should be preserved." Seven hundred eighty-four comments from NPCA members stated that "I value the natural quiet that can be experienced in an area surprisingly close to a large urban area."

On the other hand, eleven comments felt that sound levels were not a problem. There are also concerns that sound should not be used to curtail activities and that any "soundscape plan" would need to be scientifically based and have significant input from the boating community).

• Biodiversity is an important issue and there is concern that the park protect native plants and animals. Twenty-two individual newsletter responses said that the park should "...renew its commitment to the preservation of native species of Biscayne Bay and their habitats." Three hundred eight-one comments from NPCA members stated "I strongly support the concept of creating more natural and cultural resource reserve zones. The increase in boater traffic and the potential loss of irreplaceable marine resources calls for setting aside a few places where the survival of these resources is assured and that I fully support the prohibition of all consumptive uses in designated reserves."

Over 50 individual reserve-area concerns were received. Thirty-one commenters favored the use of reserve areas to protect a sustainable ecosystem and twelve respondents said that reserves were a bad idea. Seven comments indicated that protection of resources is important, but should be tried by means other than restriction.

NPCA, Center for Marine Conservation, Biodiversity Legal Foundation, Florida Biodiversity Project, and the Tropical Audubon Society all support the protection of biodiversity with the establishment of no-take

reserves. NPCA also stresses that the GMP should identify approaches for gaining input from the community and fishing industry about fisheries management.

• Impacts to resources from adjacent lands are a concern for many respondents. Comments received stated that development on, and uses of neighboring lands could have a detrimental impact on resources. Waterflow into Biscayne Bay from surrounding land is an issue and there is a perception that ground-water flows and fresh water from flood control were impacting resources in Biscayne Bay. Comments received stated that Biscayne National Park should plan holistically, within the context of the Comprehensive Everglades Restoration Plan.

Seven hundred eighty-four NPCA member comments asked the park to "...implement, as a priority, the projects in the Comprehensive Everglades Restoration Plan related to restoring freshwater flows to Biscayne Bay; and to consider expanding Biscayne's boundaries to include the so-called "model lands" area in the southeast. Let's protect them before development devastates the park."

• Comments received regarding cultural resources stated a desire to have cultural resources protected however there is also the perception that, in some areas, there were already too many restrictions. Seven individual newsletter comments stated that the park needed better protection of shipwrecks. A couple of comments said that restrictions in the area of the Fowey were excessive (comment 0023).

Three hundred eight-one comments from NPCA members stated that there is strong support for "...the concept of creating more natural and cultural resource reserve zones." Comments from NPCA ask the park to adopt a submerged cultural resources strategy that includes "...inventory, monitoring, research, interpretation, education, and protection activities."

The Sierra Club urges the park to "...support the preservation of the Stiltsville structures, because the Sierra Club believes them to be of great historical value." The Tropical Audubon Society asks the park to apply new, expanded or revisited methods of protecting cultural resources.

- Viewshed issues ranged from comments that the power plant at Turkey Point and the landfill known as "Mt. Trashmore" were intrusive to comments that light pollution was a problem. Two individual newsletter comments felt that Turkey Point and Mt. Trashmore were intrusions on the visual scene. Four comments asked the park to protect natural beauty.
 - Seven hundred eighty-four NPCA comments stated "...because manmade structures and the presence of vehicles are minimal, visiting the park is a much more enriching and rewarding experience."
- Land Use and Economic Development Issues: This category is divided into three areas of concern: partnerships, boundary adjustments, and Stiltsville.

Visitor Experience: Comments expressing issues and concerns regarding visitor experience reflect the tension between protecting park resources and providing for public enjoyment. Visitor experience issues range from differing opinions on levels of access and what means of transport are appropriate to access areas of the park. Boating, vessel size, and speed limits all received comment. Other visitor experience issues are adequacy of navigational aids, maintaining (or not) navigational channels, allowing for diverse recreational uses such as snorkeling, diving, recreational fishing, motor-boating and non-motorized boating, nature-viewing, and educational programs. The adequacy of recreational facilities also received comment.

• The question of access to areas of the park generated considerable comment. Concerns revolved around the issue of ensuring public access to representative park resources. The issue of motorized versus non-motorized boats and vessel size as well as boating speed limits all received comment. At the center of this discussion is the proposed park management prescription describing reserve areas to protect sensitive park resources.

Thirty-one individual newsletter comments asked the park to not change the way resources are presently accessed. These comments felt that boating is not a problem, that there may be too many restrictions already, and stressed that the parks are for people and must be managed for that purpose. Fifteen individual comments asked for improved access to park resources including more hiking trails, increasing the ability of "land-locked" visitors to experience the keys, and improving access to the park from regional metropolitan areas. Several comments stated that "...to protect and preserve the park for what it is we sometimes need to make sacrifices and that the longevity of the park is more important that just the use of the park..." Other comments asked the park to identify the types and levels of visitor use in different areas of the park consistent with achieving desired resource conditions.

• Boating issues, including motorized and non-motorized, vessel size, and navigational corridors issues, is a very important topic for many respondents. Sixteen individual newsletter comments desired non-motorized means, such as canoe or kayak trails, of experiencing park resources. Several comments asked for increased access to Jones Lagoon.

Comments received during the second round of public scoping specifically addressed boating speed limits. Six comments specifically stated that "...speed limits except in very few zones are too restrictive." Fourteen comments felt that speed limits and no-wake zones were desirable, particularly in swimming areas and to protect the park's resources. There is concern that the park will "...overflow with reckless/dangerous boaters." Several comments asked the park to limit the size of vessels in park waters.

The Marine Council stated that they "...feel that impacts from boating are over emphasized as regulation targets." The Marine Council also questions why marinas are not mentioned in the draft management prescriptions and that existing navigation channels need to be maintained.

• Whether or not recreational fishing is an appropriate activity received a great deal of comment. Twenty-one individual comments feel that any restriction on recreational fishing would endanger fishing rights.

On behalf of its members, the Marine Council stated that "it was their understanding that the State of Florida retained the right to regulate fisheries within the park and are concerned about the development of a fisheries management plan as a complementary document to the GMP and feels that a statewide perspective is required for fisheries within the park.

Three hundred eighty-one NPCA member comments stated "...full support for the prohibition of all consumptive uses in designated reserves. Fish populations in Biscayne Bay have been declining, so it would be advisable to identify reserve areas that include productive fishery breeding and nursery areas." One comment stated that "you can't remove a rock from the national park, but you can take lobsters, why?" Other comments stated that recreational fishing should be restricted in primitive areas and that the park should "control, protect, and preserve fisheries to allow continued fishing.

The National Parks and Conservation Association "...supports the establishment of reserves to protect fish populations," but feels that NPS should "...identify approaches for gaining input from the fishing community about fisheries management and identify models such as the Dry Tortugas GMP and various approaches of the Florida Keys National Marine Sanctuary for innovative fishery management tools."

The Center for Marine Conservation stated that there "...is overwhelming support in the scientific community for the use of marine reserves to help maintain and rebuild certain fish populations," and recommends that NPS establish one or more no-take zones, include guidelines for selection of functional reserves to have clear goals and objectives and to represent a wide variety of environmental conditions, designate closure areas, and to include marine zoning with areas subject to restrictions, buffer zones to accommodate compatible recreation, non-motorized areas, navigation corridors, and developed areas.

The Biodiversity Legal Foundation asks NPS to include a comprehensive analysis of the effects of recreational fishing that would be harmful to the marine ecosystem and which should be either prohibited or regulated.

The Florida Biodiversity Project requests NPS to consider no-take marine reserves as consistent with legal mandates and to enhance surrounding fisheries as well as the visitor experience.

• The issue of navigational corridors received several comments, particularly during the second round of public scoping. The majority of individual comments wish to see navigational channels maintained. (55 individual comments ask the park to maintain navigational channels and

to mark sensitive resources with buoys to prevent damage as well as to facilitate visitor access.

There is concern regarding the Florida Power and Light Barge traffic across park waters. Five comments specifically mentioned that there should be no commercial barge traffic in the park. Other comments suggested that the park work with Florida Power and Light to find alternative ways to transport fuel to Turkey Point.

The Marine Council asks that any management concept must deal with the ability to maintain existing channels for navigation.

The Tropical Audubon Society's comments on behalf of its 2,500 members request that navigational corridors "...should be managed to prevent impacts on resources outside the corridors. "Moderate impacts on resources" should be described and probably should not be acceptable in a national park. Vessel size, speed and draft must be regulated, appropriate to impacts on resources within and outside the corridors. Jurisdictional issues should be managed and negotiated, not abdicated.

Comment from Miami-Dade County Park and Recreation Department states that The Park and Recreation Dept. operates 2 public marinas with navigational easements through the park. (Black Point and Homestead Bayfront). "We are committed to maintaining safe, public navigational access through the two channels. Guiding vessel traffic through wellmarked navigable channels is essential to limiting impacts to adjacent natural resources. The resource condition should recognize county-owned navigation facilities separately from other public and private channels identified and should reflect the county's existing easements for the two channels. Each are 31,000 feet long and 150 feet wide. Delete references to Black Point Channel and Homestead Bayfront Channel in resource conditions (item 5) and substitute: "no new channels will be created by Miami-Dade County with the National Park. Existing Miami-Dade County navigational channels shall be operated and maintained in alignments and configurations consistent with existing easements from the State of Florida and agreements between Miami-Dade and the NPS."

• Issues regarding diverse recreational uses received comment. Forty-four individual comments state that the unique opportunity to enjoy pristine natural areas so close to an urban area is desirable and that the park

should be a preserve for people to experience life near the ocean (snorkeling, sailing, and swimming). Some comments suggest that the park is over-crowded, specifically the area at Sands Cut and that the Columbus Day Regatta is inappropriate.

On the other hand there are comments favorable to the Columbus Day Regatta and the suggestion that the park consider the needs of "party-shoalers" before setting navigational corridors.

The Marine Council states that efforts should be made to allow Biscayne Bay traditions such as the Columbus Day Regatta to co-exist with the park in a more favorable relationship than has existed in recent years.

The Bluewater Network urges NPS to flesh-out criteria for determining the appropriateness of recreational activities.

The Biodiversity Legal Foundation requests NPS to provide a detailed and comprehensive analysis of existing recreational activities at the park and the adverse effects of such activities on listed and sensitive plant and wildlife species, specifically recreational boating uses known to cause adverse effects to birds, reptiles, and sealife.

- Recreational facilities generated comments about camping, picnicking, and visitor center facilities. Thirty-four individual comments state that more recreational facilities are needed, particularly on the keys. For example, comments asked for primitive camping on Sands Key and Ragged Key, for visitor information to be available at the marinas, for the park to consider developing a visitor information station in the northern part of the park, and to make Elliott Key more of a focal point of the park. On the other hand, ten comments stressed that NPS should not make any unnecessary man-made changes and that "...too much pavement and too many buildings don't belong in a national park."
- Educational Programs received several comments regarding the park's role as "...a leader in education and interpretation of terrestrial and marine resources." Comments received regarding education programs are generally supportive of the park providing "...more of an educational experience," and stressing the importance of the park working with diverse cultures to instill a sense of stewardship." 130 electronic

comments stated that the interpretative center on Elliott Key needed to be improved.

Land Use/Economic Development: The topic of land use and economic development received general comments regarding boundary adjustment issues and concerns, partnership opportunities, the appropriateness of commercial fishing, law enforcement for resource protection and public safety, and Stiltsville. Comments on boundary issues range from expanding the park's boundaries to include waters to the south and north as well as buffer lands to the west; to decreasing the park's boundaries to exclude Stiltsville. Comments are generally favorable in urging NPS to explore partnership opportunities. The appropriateness of commercial fishing received considerable comment. The adequacy of law enforcement for resource protection and visitor safety, and Stiltsville also received considerable comment.

• Comments on boundary adjustment issues range from expanding the park's boundaries to include Barnes and Card Sounds as well as Linderman and Ragged Keys and the Old Cutler Power Plant; to restricting the park's boundary on the north which would remove Stiltsville from the park.

Twenty-three individual comments suggest that the "...park boundaries be expanded south to include Card Sound and Barnes Sound to enable management of ecosystem by one governmental agency." Other comments ask the park to cooperate with surrounding landowners to promote the preservation of undeveloped, functional wetlands surrounding the park. The addition of the "Miami Circle" is also mentioned as a desirable boundary adjustment issue, as well as including the Marine Sanctuary east of the outer reefs.

On the other hand there are several comments asking that the park's boundary be restricted on the north to exclude Stiltsville.

- 10 individual comments support the addition of Barnes and Card Sounds and Linderman and Ragged Keys;
- 8 individual comments support changing the park boundary to exclude Stiltsville;
- 7 individual comments support the addition of buffer lands and model lands.

- 1 comment to add the Marine Sanctuary
- There is general support for the park to partner with surrounding landmanagement entities to more efficiently manage park resources in a regional context. The comment is frequently made that the ability of the public to understand differences in jurisdiction is difficult due to overlapping land management with differing regulations.

Twenty-one individual comments asked the park to "...work with other state and federal land and marine management agencies to coordinate consistent regulations for visitor access and use of the park." Comments also asked that the park consider co-locating park facilities with other land-managing agencies.

There is also interest in dispersing visitor contact stations throughout the region, including establishing contact stations (with a law enforcement component) at local marinas.

There is interest in locating a visitor contact station in the northern part of the park. There is interest in expand hours of operation. Eight comments said that the park should hire more staff. Three comments and one comment asked the park to use green technology for park operations.

- 9 comments stating that conflicting regulations are confusing;
- 6 comments regarding co-locating facilities
- 6 comments suggesting dispersing visitor contact stations throughout the region, including a visitor contact station in the northern area of the park
- Commercial Fishing: A majority of comments felt that commercial fishing was not an appropriate activity in the park. Twenty-eight individual newsletter responses stated that commercial fishing was not appropriate, 16 individual newsletter comments indicated that commercial fishing is appropriate, and 4 individual newsletter comments felt that commercial fishing is appropriate, but needs restrictions. One comment felt that commercial fishing was over-restricted.

784 NPCA member comments state that "...impacts of commercial fishing (by-catch, depletion of fish stocks, coral reef protection) must be carefully investigated. Based on the results, those activities causing harm should be removed or regulated to prevent damage.

381 NPCA member comments state that "I fully support the prohibition of all consumptive uses in designated reserves. Fish populations in Biscayne Bay have been declining, so it would be advisable to identify reserve areas that include productive fishery breeding and nursery areas.

The Marine Council states that the State of Florida has retained the right to regulate fisheries within the park.

NPCA comments that fisheries management must be significantly improved to address the declines of fish populations, however that the park should identify approaches for gaining input from the fishing community and fishing industry about fisheries management and identify models such as the Dry Tortugas GMP for innovative fishery management tools to employ.

The Center for Marine Conservation states the park should establish notake zones, designate closure areas, and include marine management zoning.

Biodiversity Legal Foundation urges the park to include a comprehensive analysis of the effects of commercial fishing and that any fishing activities that are harmful to the marine ecosystem (including shrimp bottom-trawling) should be either prohibited or regulated so that adverse impacts are completely eliminated.

Florida Biodiversity Project states that NPS has an affirmative duty to protect natural resources and supports the establishment of fully protected marine reserves.

The Tropical Audubon Society urges NPS to authorize marine wilderness zones totaling at least 20% of the park's marine area in which no disturbance of natural resources would be permitted.

• Law Enforcement: There is support for enforcing existing regulations and increasing the protection staff. Eighteen comments favor more law

enforcement presence, particularly on the keys and on the water. Four comments felt that the park was over-regulated. Five comments indicated that the regulations of adjacent jurisdictions were confusing. Four comments reinforced the perception that there is confusion among the regulations of overlapping jurisdictions.

• **Stiltsville:** The issue of Stiltsville received many comments. In the initial round of public scoping nearly 500 comments were received regarding Stiltsville. The bulk of these comments are form responses received either via email or through the U.S. Mail.

Thirty individual responses to the newsletters and public meetings wish to see Stiltsville remain, stating the desirability of retention of the structures in private hands. For example, comments stated that "...the Cuban community is very sensitive to the "taking" of private property," and that "...Stiltsville is a special place for people who live in the area, and is a landmark to bring visitors to."

Eleven individual responses to the newsletters and public meetings want to see Stiltsville removed, and four would like to see the buildings adapted for public use.

130 electronic comments were received in favor of retaining Stiltsville in private hands.

352 form-letter comments, addressed to the Secretary of the Interior, stated that the writer "...was strongly opposed to any lease extensions for the structures within Biscayne National Park, Florida, known as Stiltsville.